

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DANIEL GOLDEN and TRACY
LOCKE,

Plaintiffs,

v.

NEW JERSEY INSTITUTE OF
TECHNOLOGY and CLARA
WILLIAMS, in her capacity as Custodian
of Records for the New Jersey Institute of
Technology,

*Defendants/Third-Party
Plaintiffs/Third-Party
Defendants,*

v.

FEDERAL BUREAU OF
INVESTIGATION,

*Third-Party Defendant/
Third-Party Plaintiff.*

HON. MADELINE C. ARLEO

Civ Action No.
2:15-cv-08559-MCA-LDW

PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES

TO:

Gary Potters
POTTERS & DELLA PIETRA LLP
100 Passiac Ave
Fairfield, NJ 07004
Tel: (973) 575-5240
gpotters@pdplawfirm.com

Attorney for Defendants/Third-Party Plaintiffs/Third-Party Defendants New Jersey Institute of Technology and Clara Williams

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

PAUL J. FISHMAN
United States Attorney

JACQUELINE COLEMAN SNEAD
Assistant Branch Director

ANDREW E. CARMICHAEL
Trial Attorney
VA Bar No. 76578
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, N.W., Rm.7218
Washington, D.C. 20530
Tel: (202) 514-3346
Fax: (202) 305 2685
Email: andrew.e.carmichael@usdoj.gov

CHRISTOPHER D. AMORE
Assistant U.S. Attorney
U.S. Attorney's Office
District of New Jersey
970 Broad Street, Suite 700
Newark, New Jersey 07102
Tel: (973) 645-2757
Fax: (973) 297-2010
Email: Christopher.amore@usdoj.gov

Attorneys for the Federal Bureau of Investigation

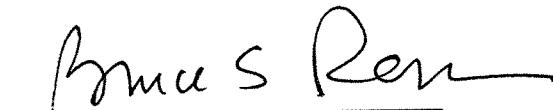
PLEASE TAKE NOTICE that in accordance with the Court's Order of October 20, 2017, ECF No. 52, Plaintiffs Daniel Golden and Tracy Locke (collectively, "Plaintiffs"), respectfully move for an award of attorneys' fees under

Section 47:1A-6 of the New Jersey Open Public Records Act, N.J.S.A. 47:1A-1, *et seq.*, from Defendants/Third-Party Plaintiffs/Third-Party Defendants the New Jersey Institute of Technology and its Custodian of Records, Clara Williams (collectively, "NJIT"), in the amount of \$189,359, at a date and time to be assigned by the Court.

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely upon their brief, accompanied by the Declarations of Katie Townsend, Bruce S. Rosen, John C. Connell and Daniel Golden. A proposed order is also attached. Oral Argument is requested.

Dated: November 30, 2017.

Respectfully submitted,



Bruce S. Rosen
MCCUSKER, ANSELMI, ROSEN &
CARVELLI, P.C.
210 Park Ave., Suite 301
Florham Park, NJ 07932
Tel: (973) 635-6300
Fax: (973) 635-6363
BRosen@marc.law
Counsel of Record for Plaintiffs

Katie Townsend (*pro hac vice*)
Adam A. Marshall (*pro hac vice*)
THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
1156 15th St. NW, Suite 1250
Washington, DC 20005
Tel: (202) 795-9300

Fax: (202) 795-9310
ktownsend@rcfp.org
amarshall@rcfp.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed with the Clerk of the Court using the ECF system, which will automatically send notification of such filing and serve counsel for the following parties

Gary Potters, Esq.

Attorney for Defendants/Third-Party Plaintiffs/Third-Party Defendants New Jersey Institute of Technology and Clara Williams

Andrew Carmichael, Esq.

Christopher Amore, Esq.

Attorneys for the Federal Bureau of Investigation

This 30th day of November, 2017.

/s/ Bruce Rosen